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Food Protection Program Policies, Procedures and Guidelines

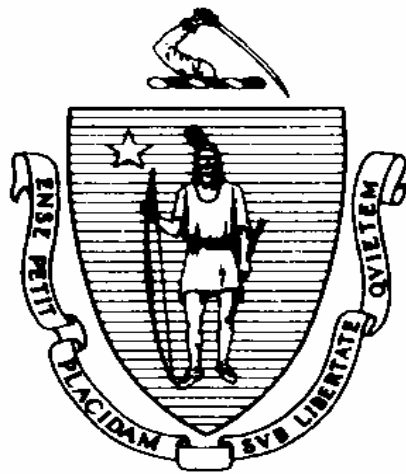
Issue: **Commingling Shellfish**

No: SF-08

See Attached Guidelines

Guidelines for the Commingling of Shellfish

Massachusetts Department of Public Health
Food Protection Program



Definitions:

- **Commingling** - means the act of combining different lots of shellfish or shucked shellfish.
- **Lot of Shellstock** - means a collection of single-specie, bulk shellstock of no more than one day's harvest from a single defined growing area harvested by one or more harvesters.
- **Lot of Shucked Shellfish** - means a collection of containers of no more than one day's shucked shellfish product produced under conditions as nearly uniform as possible, and designated by a common container code or marking.
- **Primary Dealer** - means a wholesale dealer possessing a license or permit issued by the Massachusetts Division of Marine Fisheries (DMF) and/or the Massachusetts Department of Public Health (DPH).

Procedures:

1. The practice of commingling is limited to licensed wholesale dealers who purchase shellstock directly from harvesters or other licensed dealers.
2. Only shellstock from areas classified as "Approved" shall be appropriate for commingling.
3. Shellstock tags shall indicate from which area and on what date the commingled shellstock was harvested. Shucked product labels shall indicate the date the product was shucked.
4. Tags of commingled shellstock that has been held in wet storage shall include the statement: "This Product was in Wet Storage at (Facility Certification Number) from (Date) to (Date)".
5. Shellstock and/or shucked product inappropriate for, or not intended for commingling, shall be stored in a manner as to prevent cross-contamination and/or inappropriate commingling.
6. When an entire cargo consists only of molluscan shellfish products (oysters, hard or soft shell clams, mussels, etc.), the various lots shall be separated so as to avoid unintentional cross-contamination and/or commingling. When a lot of shellfish is part of a mixed cargo (other seafood or non-seafood products), it shall be protected from contamination and/or commingling through partitioning, horizontal separation or other isolation methods. No cargo may be placed on or above the shellfish unless all cargo is packed in sealed, crush-resistant, waterproof containers.
7. All handling and recordkeeping practices shall ensure that any container of shellfish can be traced-back to a specific harvest date and harvest area.

Operations:

1. Repacking:

- Shellstock or shucked product from different lots shall not be commingled during repacking.
2. Wet Storage:
 - Commingling of bivalve mollusks with other species in wet storage may subject the bivalve mollusks to contamination from pathogenic organisms from the non-molluscan animals. Fish, crabs, lobsters, and other marine species may be harvested from polluted areas and may have ingested pathogens or accumulated them on their body surfaces. Therefore, holding such animals in the same system with bivalve mollusks presents a risk of cross contamination.
 - Shellfish from harvest areas not classified as “Approved” shall not be commingled during wet storage. If multiple lots of shellfish from “Approved” areas are being held in wet storage at the same time, the identity of each individual harvest lot and its harvest area shall be maintained throughout the wet storage process.
 - Shellstock shall not be commingled with other species in the same tank. If multiple tank systems use a common water supply system for both the bivalve mollusks and the other species, the process water shall be disinfected prior to entering tanks containing the bivalve mollusks.
 3. Depuration:
 - Different harvest lots of shellfish shall not be commingled during washing, culling, processing, or packing. If more than one harvest lot of shellfish is being processed at the same time, the identity of each harvest lot shall be maintained throughout the depuration process and final packing. If shellfish in different tanks are at different stages of depuration, each tank shall be labeled to show when depuration began. Non-purified shellfish may not be removed from a depuration plant except under direct supervision of a health inspector.
 - Different shellfish species shall not be processed in the same depuration unit unless credible scientific evidence demonstrates that the species are compatible.
 4. Shucking:
 - Shellstock from different lots must be kept separated. The commingling of shellstock from different harvest areas is prohibited, except where all shellstock has been harvested from areas classified as “Approved”. Shucked product may be commingled only if it is from two consecutive days processing. No more than a single containers-worth of shucked product may be commingled. The labeling on the container shall read “CO” before the date, e.g., CO050197 or CO121. The areas commingled must be documented in the daily shucking log and in the sales records.